

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RACHELLE COLVIN, individually and as  
next friend of minor Plaintiff, G.D., and  
DANIELLE SASS, individually and as next  
friend of minor Plaintiff, L.C., and on behalf of  
all others similarly situated,

Plaintiffs,

v.

ROBLOX CORPORATION, SATOZUKI  
LIMITED B.V., STUDS ENTERTAINMENT  
LTD., and RBLXWILD ENTERTAINMENT  
LLC,

Defendants.

Case No. 3:23-cv-04146-VC

**SUPPLEMENTAL JOINT CASE  
MANAGEMENT CONFERENCE  
STATEMENT**

Judge: Hon. Vince Chhabria

Date: April 18, 2024

Time: 2:00 PM

Courtroom: By Videoconference

Plaintiffs Rachelle Colvin, G.D., Danielle Sass, L.C., and Defendant Roblox Corporation (“Roblox”), together, the Parties, submit this supplemental joint statement in advance of the case management conference (“CMC”) scheduled for April 18, 2024, to provide two updates. First, they write to advise the Court that the parties in this action and in the related action, *Gentry et al. v. Roblox Corp. et al*, Case No. 3:24-cv-01593-VC, do not oppose consolidation. *See* Case No. 3:23-cv-04146-VC, ECF Nos. 72, 73 (relating case and postponing ruling on consolidation until after the April 18, 2024, case management conference). And second, if the Court consolidates these actions, the parties are amenable to one of the below proposed schedules. These schedules are the same as those proposed in the joint statement in *Colvin*, the first-filed case, *see* ECF No. 75 at 14, but now include an agreed-upon requirement for the plaintiffs to file a consolidated complaint.

<b>Event</b>	<b>Defendant's Proposal</b>	<b>Plaintiffs' Proposal</b>
<b>Deadline for <i>Colvin</i> and <i>Gentry</i> Plaintiffs to File Consolidated Complaint</b>	May 2, 2024	April 23, 2024
<b>Deadline for Roblox to Respond to Consolidated Complaint</b>	June 6, 2024	May 14, 2024
<b>Deadline to Pursue ADR</b>	August 16, 2024	July 18, 2024
<b>Disclosure of Primary Class Certification Experts and Expert Reports</b>	October 31, 2024	October 31, 2024
<b>Disclosure of Class Certification Rebuttal Experts and Reports</b>	January 29, 2025	December 2, 2024
<b>Close of Class Certification Expert Discovery</b>	March 23, 2025	March 23, 2025
<b>Motion for Class Certification</b>	March 31, 2025	March 31, 2025
<b>Opposition to Class Certification</b>	May 30, 2025	April 30, 2025
<b>Reply Supporting Class Certification</b>	June 30, 2025	May 21, 2025

<b>Event</b>	<b>Defendant's Proposal</b>	<b>Plaintiffs' Proposal</b>
<b>Hearing on Class Certification</b>	July 30, 2025, or at the Court's convenience	At the Court's discretion
<b>Close of Fact Discovery</b>	Per the Court's instructions at the February 23, 2024 Case Management Conference, Roblox has reserved the remaining deadlines to be determined at a later date.	June 27, 2025
<b>Disclosure of Trial Experts</b>		July 25, 2025
<b>Disclosure of Rebuttal Trial Experts</b>		August 25, 2025
<b>Close of Trial Expert Discovery</b>		September 26, 2025
<b>Dispositive Motion Deadline</b>		October 10, 2025
<b>Oppositions to Dispositive Motions</b>		November 10, 2025
<b>Replies Supporting Dispositive Motions</b>		December 1, 2025
<b>Hearing on</b>		At the Court's

Event	Defendant's Proposal	Plaintiffs' Proposal
Dispositive Motions		discretion
Pretrial conference		January 5, 2026
Trial		January 12, 2026

Respectfully submitted,

/s/ James Bilborrow  
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**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

/s James Bilsborrow